> United States Courts Southern District of Texas FILED

> > July 15, 2025

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

UNITED STATES OF AMERICA	§		
v.	\$ \$ \$	CRIMINAL NO.:	4:25-cr-146-S
MICHAEL SEERY,	§		
RICARDO OBANDO JR., and	§		
MATTHEW ROSAS	§		
Defendants.	§		

FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

<u>Title 18, United States Code, Section 1958</u> <u>CONSPIRACY TO USE INTERSTATE COMMERCE FACILITIES IN THE</u> <u>THE COMMISSION OF MURDER-FOR-HIRE</u>

Beginning on an unknown date, but no later than on or about December 1, 2024, and continuing through at least on or about March 6, 2025, in the Southern District of Texas and elsewhere, defendants

MICHAEL SEERY, RICARDO OBANDO JR., and MATTHEW ROSAS

did knowingly and intentionally combine, conspire, confederate and agree together and with each other to use or cause another to use facilities of interstate or foreign commerce, including but not limited to, cellular communications, internet communications, firearms, means of transportation, and bank transactions, with the intent that a murder be committed in violation of the laws of the State of Texas and of the United States as consideration of a promise or agreement to pay, anything of pecuniary value, resulting in personal injury to R.D., in violation of Title 18, United States Code, Section 1958.

In furtherance of and to affect the objectives of the conspiracy, and to accomplish its purposes and objectives, the defendants committed and caused to be committed the following overt acts, among others, in the Southern District of Texas:

- 1. On or about January 17, 2025, defendants arranged the purchase of an unregistered vehicle for the specific purpose of covertly surveilling R.D. and learning his travel patterns to aid in the planning and implementation of his murder. Defendants also used the vehicle to follow R.D. as he traveled to work on or about February 4, 2025, before eventually shooting him that same day.
- 2. Over the course of the conspiracy, Defendant Seery sent multiple monetary payments to Defendant Obando via secured transaction bank payments and electronic transactions for Defendant Obando's role in the conspiracy, namely to shoot and kill R.D.
- 3. On or about January 18, 2025, Defendant Seery constructed a firearm and firearm silencer with the aid of a three-dimensional printer and subsequently gave these items to Defendant Obando with the specific intent that these items be used to murder R.D. at a later date.
- 4. On or about February 3, 2025, defendant Seery sent defendant Obando \$305 via electronic bank transfer with the specific intent that defendant Obando pay defendant Rosas for his

- role in the murder of R.D. Defendant Obando then withdrew \$305 in cash from an ATM on the same day and paid defendant Rosas for his role in the conspiracy to murder R.D.
- 5. On or about February 4, 2025, defendant Rosas drove the unregistered vehicle referenced above with defendant Obando as his passenger. The two waited for R.D. to leave his home and then followed him before eventually pulling along-side R.D. as he traveled to work in his own vehicle. Defendant Obando then shot R.D. multiple times from the vehicle as it was driven by Defendant Rosas.

The Grand Jury incorporates by reference as additional overt acts the offenses set forth in Counts Two through Six of this Superseding Indictment.

All in violation of Title 18, United States Code, Section 1958.

COUNT TWO

Title 18, United States Code, Section 1958
USE OF INTERSTATE COMMERCE FACILITIES IN THE
COMMISSION OF MURDER-FOR-HIRE RESULTING IN PERSONAL INJURY

Beginning on or about January 17, 2025, and continuing through February 4, 2025, in the Southern District of Texas and elsewhere, defendants

MICHAEL SEERY, RICARDO OBANDO JR., and MATTHEW ROSAS

each aided and abetted by the other, used or caused another to use facilities of interstate or foreign commerce, including but not limited to, cellular communications, internet communications, firearms, means of transportation, and bank transactions, with the intent that a murder be

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committed in violation of the laws of the State of Texas and of the United States as consideration of a promise or agreement to pay, anything of pecuniary value, resulting in personal injury to R.D., in violation of Title 18, United States Code, Sections 1958 and 2.

COUNT THREE

Title 18, United States Code, Sections 924(c)(1)(A) and 2
USE, CARRY, POSSESS, AND DISCHARGE A FIREARM DURING
AND IN RELATION TO A CRIME OF VIOLENCE

On or about February 4, 2025, in the Southern District of Texas, defendants

MICHAEL SEERY, RICARDO OBANDO JR., and MATTHEW ROSAS

did aid and abet each other and did knowingly use, carry, and discharge a firearm during and in relation to a crime of violence, and possess a firearm in furtherance of a crime of violence, for which defendants may be prosecuted in a court of the United States, namely use of interstate commerce facilities in the commission of murder-for-hire resulting in personal injury as set forth in Count Two of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT FOUR

Title 18, United States Code, Sections 924(c)(1)(A-B) and 2,
POSSESSION OF A FIREARM EQUIPPED WITH A FIREARM SILENCER
IN FURTHERANCE OF A CRIME OF VIOLENCE

On or about February 4, 2025, in the Southern District of Texas, defendants,

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MICHAEL SEERY, RICARDO OBANDO JR., and MATTHEW ROSAS

did aid and abet each other and did knowingly possess a firearm equipped with a firearm silencer and firearm muffler in furtherance of a crime of violence for which defendants may be prosecuted in a court of the United States, namely use of interstate commerce facilities in the commission of murder-for-hire resulting in personal injury, as set forth in Count Two of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A-B) and 2.

COUNT FIVE

Title 18, United States Code, Section 924(h) KNOWING TRANSFER OF A FIREARM FOR USE IN A FELONY

On or about February 2, 2025, in the Southern District of Texas, the defendant,

MICHAEL SEERY

did knowingly transfer a firearm, namely a handgun of an unknown make and model, having reasonable cause to believe that the firearm would be used in the commission of a felony, namely use of interstate commerce facilities in the commission of murder-for-hire, in violation of Title 18, United States Code, Section 924(h).

COUNT SIX

<u>Title 18, United States Code, Section 924(h)</u> KNOWING RECEIPT OF A FIREARM FOR USE IN A FELONY

On or about February 2, 2025, in the Southern District of Texas, the defendant,

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RICARDO OBANDO JR.

did knowingly receive a firearm, namely a handgun of an unknown make and model, having reasonable cause to believe that the firearm would be used in the commission of a felony, namely use of interstate commerce facilities in the commission of murder-for-hire, in violation of Title 18, United States Code, Section 924(h).

COUNT SEVEN

<u>Title 18, United States Code, Section 922(g)(1)</u> FELON IN POSSESSION OF A FIREARM

On or about March 6, 2025, in the Southern District of Texas, the defendant,

MICHAEL SEERY

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year did knowingly possess a firearm, that is;

- (1) a Kimber Ultra Carry firearm serial number: KU351328,
- (2) a Glock, model 19, 9mm pistol, serial number: CEUE108,
- (3) a Beretta, model 92XI, 9mm pistol, serial number: 92X0089239,
- (4) a Beretta, Model 80X Cheetah, serial number: Y026862X,
- (5) a Beretta, model 92FSR, .22 caliber pistol, serial number: BM065505,
- (6) a Palmetto State Armory, model Jakl Pistol, serial number: J3001914,
- (7) a Palmetto State Armory, model PA-15 rifle, serial number: SCB415675,

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- (8) a Palmetto State Armory, model PA-15 AR rifle, serial number: SCNL211460, and
- (9) a Palmetto State Armory, Model Dagger Compact, 9mm pistol, serial number: FG123248,

said firearm(s) having been in or affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that the firearm(s), involved in violation of Title 18, United States Code, Section 922 as charged in the indictment, are subject to forfeiture.

A TRUE BILL:

Original Signature on File

FOREMAN OF THE GRAND JURY

Nicholas Ganjei United States Attorney

BY:

B. Hunter Brown

Assistant United States Attorney